IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 22-10355

Susan F. Boyd-Noel : Chapter 13

: Judge Eric L. Frank

OBJECTION OF PNC BANK, N.A. TO CONFIRMATION OF THE PLAN (DOCKET NUMBER 10)

PNC Bank, N.A. ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Susan F. Boyd-Noel ("Debtor") as follows:

- 1. Creditor holds a security interest secured by a mortgage lien on Debtor's property commonly known as 915 Charles Street, Coatesville, PA 19320-2801 ("Property").
- 2. Creditor intends to file a Proof of Claim including a pre-petition arrearage in the amount of \$19,047.34.
- 3. Debtor's Plan fails to provide for Creditor's secured claim.
- 4. Upon information and belief, Debtor still holds an interest in the Property.
- 5. As a result, Debtor's Plan fails to meet the requirements of 11 U.S.C. §1325(a)(5) as it fails to provide for a secured claim.
- 6. Creditor requests that Debtor amend the Plan to either provide for Creditor's claim or to surrender their interest in the Property.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

Adam B. Hall (323867) Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028 Telephone: 614-220-5611 Fax: 614-627-8181

Attorneys for Creditor
The case attorney for this file is Alyk L.

Oflazian.

Contact email is

ALOflazian@manleydeas.com

Case 22-10355-elf Doc 21 Filed 04/15/22 Entered 04/15/22 14:52:38 Desc Main Document Page 3 of 3

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 22-10355

Susan F. Boyd-Noel : Chapter 13

: Judge Eric L. Frank

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Objection of PNC Bank, N.A. to the Confirmation of the Original Plan was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Joseph F. Claffy, Attorney for Susan F. Boyd-Noel, claffylaw@gmail.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Susan F. Boyd-Noel, 915 Charles Street, Coatesville, PA 19320

/s/ Alyk L. Oflazian